

1 BRIAN J. STRETCH (CABN 163973)
United States Attorney

2 BARBARA J. VALLIERE (DCBN 439353)
3 Chief, Criminal Division

4 KAREN KREUZKAMP (CABN 246151)
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055
6 San Francisco, California 94102-3495
7 Telephone: (415) 436-7014
8 FAX: (415) 436-7234
Email: Karen.Kreuzkamp@usdoj.gov

Attorneys for United States of America

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,) NO. CR 11-541 EMC
14 Plaintiff,)
15 v.)
16 RONALD GLENN JONES,)
17 Defendant.)
18

19 UNITED STATES OF AMERICA,) NO. CR 17-344 EMC
20 Plaintiff,)
21 v.) STIPULATION AND ~~PROPOSED~~ ORDER
22 RONALD GLENN JONES,) RESETTING FIRST APPEARANCE AND
23 Defendant.) EXCLUDING TIME UNDER THE SPEEDY TRIAL
24) ACT
25)
26)
27)
28)

1 **STIPULATION**

2 IT IS HEREBY STIPULATED by the parties, through undersigned counsel, that:

3 1. The parties were scheduled to appear before the Court on August 2, 2017 at 2:30 p.m. for
4 a first appearance. On August 2, 2017, prior to 2:30 p.m., Assistant United States Attorney Karen
5 Kreuzkamp, counsel for the Government, and Erik Levin, counsel for defendant Ronald Glenn Jones,
6 learned that Mr. Jones, who is in custody, was not medically cleared for transport by the United States
7 Marshal Service to the Court. The parties therefore request that the first appearance be reset for
8 September 27, 2017 at 2:30 p.m.

9 2. The parties respectfully submit and agree that the period from August 2, 2017 through
10 and including September 27, 2017 should be excluded from the otherwise applicable Speedy Trial Act
11 computation because the continuance is necessary for continuity of defense counsel and effective
12 preparation of counsel, taking into account the exercise of due diligence. Specifically, the time
13 requested for exclusion will allow for continuity of counsel for the defendant, as his counsel is
14 scheduled to travel for part of August, and will allow defense counsel time to review the discovery.

15 IT IS SO STIPULATED.

16 DATED: August 2, 2017

BRIAN J. STRETCH
United States Attorney

17
18 /s/
KAREN KREUZKAMP
Assistant United States Attorney

19 DATED: August 2, 2017

20 /s/
ERIK LEVIN
Counsel for Defendant
Ronald Glenn Jones

21
22
23 **~~PROPOSED~~ ORDER**

24 Based upon the above-described Stipulation, THE COURT FINDS THAT the ends of justice
25 served by granting a continuance August 2, 2017 through and including September 27, 2017 outweigh
26 the best interest of the public and the defendant in a speedy trial, and that failure to grant such a
27 continuance would unreasonably deny the defendant continuity of counsel and would deny defense
28

STIP. AND [PROPOSED] ORDER RESETTING FIRST APPEARANCE AND EXCLUDING TIME

Case No. CR 11-541 EMC

Case No. CR 17-344 EMC

1 counsel the reasonable time necessary for effective preparation, taking into account the exercise of due
2 diligence, and would result in a miscarriage of justice. *See* 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

3 Accordingly, THE COURT ORDERS THAT:

4 1. The parties shall appear before the Court on September 27, 2017 at 2:30 p.m. for a status
5 conference.

6 2. The period from August 2, 2017 through and including September 27, 2017 is excluded
7 from the otherwise applicable Speedy Trial Act computation, pursuant to 18 U.S.C. § 3161(h)(7)(A) &
8 (B)(iv).

9
10 IT IS SO ORDERED.

11
12 DATED: 8/2/17

